

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

In re:

Thomas M. Trapp,  
Jennifer C. Trapp,  
Debtor(s).

Case No. 06-32675  
Chapter 13  
Judge Humphrey

**OBJECTION TO MOTION FOR RELIEF FROM STAY**

Now come the Debtors, through counsel, and object to the Motion for Relief from Stay, filed on, April 11, 2011, (Doc. 57), by JP Morgan Chase Bank, N.A., for the reason that Debtors intend to pay the entire arrearage owed on their mortgage with the Movant within the next ten days, and keep all future payments made in a timely fashion thereafter.

THEREFORE, Debtors respectfully pray that the Motion be denied.

Respectfully submitted,

/s/ Michael J. Ellerbrock  
Michael J. Ellerbrock (0023289)  
Attorney for Debtor  
4403 North Main Street  
Dayton, Ohio 45405  
Tel (937) 275-0944  
Fax (937) 275-7477  
mellerbrock.ecf@earthlink.net

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been sent by electronic filing to Jeffrey M. Kellner, Chapter 13 Trustee, and to Office of the U S Trustee, by electronic filing, and to Erin A. Jochim, Esq., Attorney for Movant, LERNER, SAMPSON & ROTHFUSS, PO Box 5480, Cincinnati, Ohio 45201-5480, and to the Debtors, Mr. and Mrs. Thomas M. Trapp, 2564 Acorn Drive, Dayton, Ohio 45419, on same date of filing by ordinary U S Mail.

/s/ Michael J. Ellerbrock  
Michael J. Ellerbrock (0023289)  
Attorney for Debtor